

NOVARTIS PHARMACEUTICALS )  
CORPORATION, )  
 )  
Plaintiff, ) **DOCUMENT**  
 ) **ELECTRONICALLY FILED**  
 )  
v. ) Civil Action No. 13-cv-1028-SDW-MCA  
 )  
ACTAVIS LLC; APOTEX, INC.; )  
APOTEX, CORP.; GLAND PHARMA )  
LTD.; DR. REDDY’S LABORATORIES, )  
INC.; DR. REDDY’S LABORATORIES )  
LTD.; EMCURE PHARMACEUTICALS )  
USA, INC.; EMCURE )  
PHARMACEUTICALS, LTD; HOSPIRA, )

INC.; PHARMACEUTICS )  
INTERNATIONAL INC.; SAGENT )  
PHARMACEUTICALS, INC.; ACS )  
DOBFAR INFO S.A.; STRIDES, INC.; )  
AGILA SPECIALTIES PRIVATE LTD.; )  
SUN PHARMA GLOBAL FZE; )  
CARACO PHARMACEUTICAL )  
LABORATORIES, LTD; SUN )  
PHARMACEUTICAL INDUSTRIES )  
LTD.; WOCKHARDT USA LLC; and )  
WOCKHARDT LTD. )  
Defendants. )

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**DECLARATION OF KAREN A. CONFOY IN SUPPORT OF  
WOCKHARDT USA LLC AND WOCKHARDT LTD.'S MOTION TO DISMISS  
COUNT II OF THE CORRECTED AMENDED COMPLAINT**

I, KAREN A. CONFOY, hereby declare as follows:

1. I am counsel for Defendants Wockhardt USA LLC and Wockhardt Limited (collectively "Wockhardt") in the above-captioned action and in Civil Action No. 12-3967 (SDW/MCA). I submit this declaration in support of Wockhardt's Motion to Dismiss Count II of the Corrected Amended Complaint.

2. I am an attorney at law admitted to practice before the United States District Court for the District of New Jersey. I am a partner at Fox Rothschild, LLP. Unless otherwise stated, the facts set forth in this declaration are true and of my own personal knowledge, and, if called upon to do so, I could and would testify competently to them.

3. Attached hereto as **Exhibit 1** is a true and correct copy of Novartis Corp., Novartis Pharmaceuticals Corp., and Novartis AG's Disclosure of Asserted Claims in Civil Action No. 12-3967 (SDW/MCA), served on October 12, 2012.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the Order Denying Plaintiffs' Motion for Leave to Amend Responses to Defendants' Invalidity Contentions in *Astrazeneca AB v. Dr. Reddy's Labs Inc.*, C.A. No. 11-2317-JAP-DEA (D.N.J. Mar. 18, 2013).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 27, 2013

/s/ Karen A. Confoy

Karen A. Confoy  
kconfoy@foxrothschild.com

Counsel for Wockhardt USA LLC and  
Wockhardt Limited